

ADDENDUM TO THE FACT SHEET
FOR NATIONAL POLLUTANT DISCHARGE
ELIMINATION SYSTEM (NPDES)
PERMIT NO. WA0037923

I. GENERAL INFORMATION

Facility: Rainier School Wastewater Treatment Plant
Department of Health and Social Service
P.O. Box 600
Buckley, Washington 98321

II. APPLICATION REVIEW

An application for permit reissuance was submitted to the Department of Ecology (Department) on October 16, 1998, and accepted by the Department on November 14, 2000. The scope and manner of any review of an application for replacement of permit by the Department shall be sufficiently detailed as to insure the following:

- That the permittee is in substantial compliance with all of the terms, conditions, requirements and schedules of compliance of the expired permit;
- That the Department has up-to date information on the permittee's production levels; permittee's waste treatment practices; nature, content, and frequencies of permittee's discharge; either pursuant to the submission of new forms and applications or pursuant to monitoring records and reports resubmitted to the Department by the permittee; and
- That the discharge is consistent with applicable effluent standards and limitations, water quality standards, and other legally applicable requirements listed in WAC 173-220-130.

The application for Rainier School Wastewater Treatment Plant Department of Health and Social Service was reviewed and indicates that no changes in the treatment characteristics of the effluent process or volume of wastewater has occurred.

III. PERMIT REAUTHORIZATION

This fact sheet addendum accompanies the draft permit, which is to be reauthorized to Rainier School Wastewater Treatment Plant Department of Health and Social Service for the discharge of wastewater to White River. The previous fact sheet is also part of this administrative record and explains the basis for the discharge limitations and conditions of the reauthorized permit.

The existing permit requirements, including discharge limitations and monitoring, do not need to be changed to protect the receiving water quality. The previous fact sheet addressed conditions and issues at the facility at the time when the previous permit was issued, and statements made reflected the status in 1994. Since the issuance of the current permit, the Department has not received any information which indicates that environmental impacts from the discharge that were not evaluated at the time of the last permit issuance is persuasive enough to undertake a

complete renewal of the permit. The reauthorized permit is virtually identical to the previous permit issued on June 30, 1994.

The discharge limits and conditions in effect at the time of expiration of the previous permit are carried over unchanged to this reauthorized permit. Assessment of compliance and inspections of the facility during the previous permit term indicate that the facility should not be placed on a high priority for permit renewal. The Department assigns a high priority for permit renewals in situations where water quality would materially benefit from a more stringent permit during the next five-year cycle.

The permit reauthorization process, in concert with the routine renewal of high priority permits, allows the Department to reissue permits in a timely manner and minimize the number of active permits that have passed expiration dates. A system of ranking the relative significance of the environmental benefit to be gained by renewing a permit rather than reauthorizing a permit is followed during the Department's annual permit planning process. Each permit that is due for reissuance is assessed and compared with other permits that are also due for reissuance. The public is notified and input is sought after the initial draft ranking has tentatively established which permits are likely to be completely renewed and which are likely to be reauthorized. All relevant comments and suggestions are considered before a final decision is made regarding the type of reissuance for each permit.

The only changes to the previous permit are the submittal date requirements. Submittal requirements from the previous permit that were completed and submitted and do not require additional or continued assessment were removed from this permit (S10-Nutrient Reduction Feasibility Study and S2.B. Biosolids [Sludge] Compliance). The submittal dates for the other standard compliance and submittal requirements that have been carried over from the past permit into this reauthorized permit have been adjusted to the proposed permit schedule. The Department considered these submittals necessary in the previous permit and no information has come forward to cause a reconsideration of the submittal requirement.

Public notice of the availability of the draft reauthorized permit is required at least 30 days before the permit is issued [Washington Administrative Code (WAC) 173-220-050]. The fact sheet and draft permit are available for review (see Appendix A—Public Involvement for more detail on the Public Notice procedures).

After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file for the permit and parties submitting comments will receive a copy of the Department's response. Comments and the resultant changes to the permit will be summarized in the fact sheet addendum, Appendix D—Response to Comments.

IV. RECOMMENDATION FOR PERMIT ISSUANCE

The Department proposes that this permit be issued for five years.

APPENDIX A – PUBLIC INVOLVEMENT INFORMATION

The Department has determined to reauthorize a discharge permit to the applicant listed on page 1 of this fact sheet addendum. The permit contains conditions and effluent limitations that are described in the fact sheet.

Public notice of application was published on October 8, 2000, October 15, 2000, and March 28, 2001, in *the Tacoma News Tribune* and *the Courier Harold* to inform the public that an application had been submitted and to invite comment on the reauthorization of this permit.

The Department published a Public Notice of Draft (PNOD) on June 6, 2001, in *the Tacoma News Tribune* to inform the public that a draft permit and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet addendum, and fact sheet are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Water Quality Permit Coordinator
Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the 30-day comment period to the address above. The request for a hearing shall indicate the interest of the party and the reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-220-090). Public notice regarding any hearing will be circulated at least 30 days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing (WAC 173-220-100).

Comments should reference specific test followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from reauthorization of this permit.

The Department will consider all comments received within 30 days from the date of the PNOD indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone at (360) 407-6279, or by writing to the address listed above.

APPENDIX D--RESPONSE TO COMMENTS
FOR NPDES PERMIT WA0037923
Facility Name: Rainier State School (DSHS) Wastewater Treatment

This response to comments (RTC) is an appendix to the fact sheet for the above-referenced NPDES permit. The RTC summarizes comments received during the 30-day public notice and comment period on the draft permit, and provides the Department's response. All changes to the draft permit are noted below. The Department has determined to issue this permit as revised.

Citizens for a Healthy Bay:

1. Comment:

The allowable discharge concentration levels of zinc and copper for this facility are too high; the concentrations exceed water quality standards and require a mixing zone for persistent metals in a river that provides critical habitat and passage for salmon. Examination of the discharge monitoring data for the past year shows that the facility is having no difficulty meeting the limits – in fact, the limits could be reduced by half with no impact to the operation of the facility.

Response:

Zinc showed no potential to violate standards and copper only showed a reasonable potential to violate the acute standard at the edge of the mixing zone. The proposed permit limits for copper and zinc were developed based on state water quality standards and applicable mixing zones allowed under WAC 173-201A-100. No change to permit.

2. Comment:

TMDL negotiations that took place during the current permit cycle have established waste load allocations for ammonia and biochemical oxygen demand that are already being called into question. The facility should strive to discharge less than its full allocation.

Response:

The waste load allocations for ammonia and BOD₅ per the 1993 TMDL for the Puyallup River are reflected in the proposed permit for Rainier State School (DSHS). Should these waste loads change during the next permit cycle, Rainier State Schools NPDES permit will be reopened and modified to incorporate the new waste loads for ammonia and BOD₅. No change to permit.